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August 25, 2021

VIA ECF

United States District Court
Southern District of New York
Attn: Hon. Victor Marrero, U.S.D.J.
500 Pearl Street, Courtroom 15B
New York, NY 10007-1312

Re: Rosenfield & Co., PLLC v. Trachtenberg, Rodes & Friedberg LLP, et al.
Case No.: 1:21-cv-3858 (VM) (KHP)

Dear Judge Marrero:

This firm represents all of the Defendants in the above-referenced case with the exception of Trachtenberg, Rodes & Friedberg LLP (hereinafter the “Star Defendants”). The Star Defendants write to respectfully request a one (1) week extension of time to respond to Plaintiff Rosenfield & Company, PLLC’s (hereinafter “Rosenfield”) letter dated August 20, 2021 identifying purported deficiencies in the Star Defendants’ Answer with Counterclaims, Cross-Claims, and Third-Party Complaint (hereinafter referred to as the “Plaintiff’s Letter”).

Consistent with ¶ II(B)(1) of this Court’s Individual Practices (hereinafter “Practices”), the Star Defendants’ deadline to respond to the Plaintiff’s Letter falls on Friday, August 27, 2021. The Star Defendants seek an extension of time because my colleagues and partners Jamie S. Felsen, Esq. and Joseph M. Labuda, Esq. are both away on vacation this week and will not return until Monday, August 30, 2021. In support of and consistent with ¶ I(F) of the Practices, the Star Defendants represent that: (i) this letter motion is timely submitted; (ii) there have been no previous requests for an extension of time to respond to Plaintiff’s Letter; (iii) Plaintiff does not object to the requested extension; and (iv) they are unaware of any scheduled dates that would be affected by the requested extension. Accordingly, the Star Defendants respectfully submit that good cause exists for granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A). The Star Defendants thank this honorable Court for its time and attention to this case.

Dated: Lake Success, New York
August 25, 2021

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/

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